

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

IVET, L.L.C,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 4:19-cv-694
)	
IVET360 INC.,)	
)	
Defendant.)	
)	
)	
)	

**JOINT STATUS REPORT AND
REQUEST FOR STAY PENDING CONCLUSION OF MEDIATION PROCESS**

Plaintiff iVet, L.L.C. and Defendant iVet360 Inc. hereby jointly file the following status report and request to stay this case until June 1, 2020 as the parties continue to work through the mediation process to try to reach a settlement agreement. In support, the parties state as follows.

1. On February 24, 2020, the parties participated in mediation pursuant to the Western District of Missouri’s Mediation and Assessment Program or “MAP.”
2. At the conclusion of mediation, the parties reached a Memorandum of Settlement Agreement.
3. On February 27, 2020, this Court issued an order directing the parties to file their joint stipulation of dismissal or status report by April 27, 2020. *See* Dkt. 34.
4. Since the conclusion of mediation, the parties have been working toward completing the settlement documents. However, the parties recently reached an impasse in finalizing the complete settlement documents.
5. On April 21, 2020, the parties reached out to the mediator to schedule an additional mediation session via telephone to try to resolve the remaining issues.

6. The parties are presently working with the mediator to schedule a call.

7. Accordingly, the parties jointly request a temporary stay of all proceedings in this case until June 1, 2020 to allow sufficient time for the parties to work toward completing the settlement documents. Under the current scheduling order, the deadline for the close of discovery is May 15, 2020. "[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy and effort for itself, counsel, and for litigants." *United States ex rel. J.F. Ahern Co. v. Frederick Constr., Inc.*, No. 4:11CV1611, 2011 U.S. Dist. LEXIS 141017, at *5 (E.D. Mo. Dec. 8, 2011) (quoting *Landis v. North American Co.*, 299 U.S. 248, 254, 57 S. Ct. 163, 81 L. Ed. 153 (1936)). A temporary stay would not cause hardship to either party and would preserve the status quo as the parties work through the mediation process to try to resolve this matter outside of litigation. In addition, the interests of both the Court and the public would be furthered by a stay pending mediated resolution of this matter. Not only would a stay here promote the efficient administration of justice by saving the Court the time, the effort, and the cost required to resolve the parties' dispute through litigation, it would minimize the expense of the parties' resources and those of the Court while the parties work toward finalizing the settlement documents, especially during these challenging times presented by the current COVID-19 pandemic.

8. The parties therefore respectfully request that this Court temporarily stay all proceedings in this matter and extend the time to file a joint stipulation for dismissal until June 1, 2020.

9. This request is made for good cause, and not to hinder or delay these proceedings or to cause prejudice to any party.

WHEREFORE, Plaintiff iVet, L.L.C. and Defendant iVet360 Inc. respectfully request that this Court enter an order temporarily staying all proceedings and extending the time for the parties to file a joint stipulation of dismissal until June 1, 2020.

Dated: April 27, 2020

Respectfully submitted,

/s/ Karen Donnelly
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the 27th day of April, 2020. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

/s/ Karen Donnelly